

294-295 Holborn

October 2017



DP9 Ltd
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Introduction

This note has been prepared by DP9 Planning Consultants. It provides further clarification on the approach towards addressing the planning policy requirement for the provision of affordable housing pursuant to the proposed development at 294-295 High Holborn, herein referred to as the 'Site'. Our initial note was issued in February 2017, this further note is written following a request to demonstrate that there are no available opportunities to deliver affordable housing off-site in the local vicinity.

Planning Policy

Planning policy H4 of Camden's Local Plan 'Maximising the supply of affordable housing' seeks to secure a contribution towards affordable housing from qualifying schemes in the borough. The preference is for this to be provided on-site however where this is not feasible, the Council will consider off-site provision or in specific circumstances a payment in lieu.

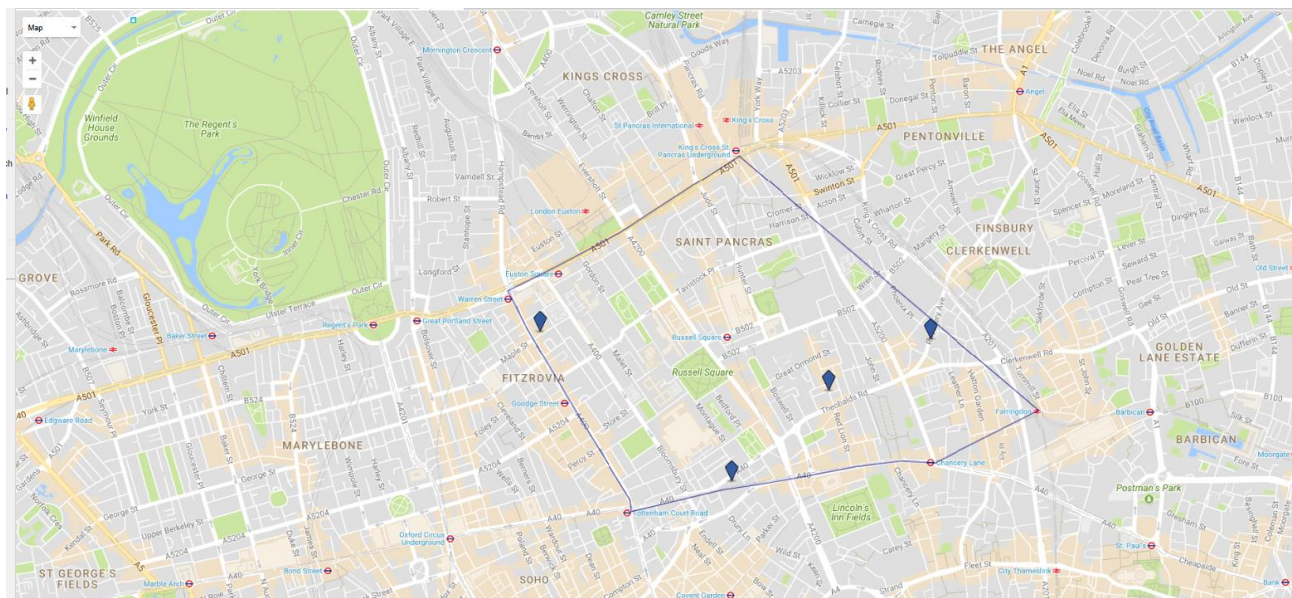
The associated policy formula equates to an affordable housing requirement of 203 sqm (GIA). Officers have accepted in this instance that due to scale and location of the Site, it is not appropriate to seek on-site affordable housing provision. In accordance with planning policy H4, it is necessary to consider whether there are opportunities to deliver affordable housing off-site. It is noted that the applicant does not own any other sites in the local area nor are they aware of any opportunities whereby affordable housing could be accommodated.

The supporting guidance for the policy requires that where off-site provision is appropriate, the Council will require this to be provided on an alternative site nearby. We understand there is an expectation for the off-site delivery opportunity to be in the same ward as the Site or a neighbouring ward in the borough.

Using Costar, a leading commercial property information database, we have undertaken desktop search of commercial properties available in the area to assess whether any have potential for conversion to accommodate to affordable housing. We have used the following criteria to determine appropriate qualifying properties:

- Does the property have potential to accommodate 200-250 sqm GIA affordable housing;
- Is a long lease (99 years+) position available;
- Could the floorspace available be appropriately separated from other uses in the building (i.e. separate residential access core to commercial floorspace); and
- Would terms of the lease or planning policy prevent the loss of the existing use.

On the basis of the above, an area incorporating the Holborn and Covent Garden Ward, King's Cross Ward and Bloomsbury Ward was selected. The mapping tool was used to identify all properties currently on the market within the three designated wards. On the 24th October 2017, 77 properties were identified as available (a full list accompanies this note). Of these, only 4 properties were available on a long leasehold, a map and assessment of these properties is provided overleaf.



Source: Costar (October 2017)

Address	Building Type	Available floorspace (Sqm)	Sqft	Lease position	Assessment
20 Lambs Conduit Street, WC1 3LE	Storage/office	2,927 (272)		986 years remaining	<p>The space is located underground and currently used as a car park, accessed via a ramp. It has very limited access to natural light.</p> <p>In principle, planning policy would resist the change of use of the floorspace to residential use due to the need to retain existing viable commercial/industrial uses.</p> <p>The layout/arrangement of space would not be appropriate for residential accommodation. In addition, there would be no/limited natural light and ventilation.</p>
14-14A Rosebery Avenue, EC1R 4TD	Office	9,390 (872)		124 years remaining	<p>The available space located at basement and lower ground levels in a large office building.</p> <p>The space has recently been refurbished to provide an attractive and high-quality layout of flexible modern workspaces.</p> <p>In principle, planning policy would resist the change of use of the floorspace to residential use due to the need to retain existing viable commercial uses.</p> <p>Residential uses would also require the creation of new access points / a core which would be physically disruptive to the rest of the building.</p> <p>Residential uses are not considerate appropriate for the available space.</p>

10 Bloomsbury Way, W1CA 2SL	Retail	7,083 (658)	N/a	<p>The space available is located at ground floor within this prominent and recently refurbished office building.</p> <p>The floorspace is prime for retail uses being within close proximity of Holborn centre. Planning policy would resist a change of use of the floorspace to residential use due to the need to retain existing viable retail uses.</p> <p>Physically, the space is currently served by floor to ceiling high glazing which would need to be extensively modified to incorporate residential accommodation. This would be contrary to the general aspiration to provide active frontages across Camden.</p>
154-162 Tottenham Court Road, W1T 7NG	Retail	5,557 (516)		<p>The space available is located at ground floor within the building and currently laid out as retail units.</p> <p>The floorspace is prime for retail uses being along Tottenham Court Road. Planning policy would resist a change of use of the floorspace to residential use due to the need to retain existing viable retail uses.</p> <p>Physically, the space is currently served by floor to ceiling high glazing which would need to be extensively modified to incorporate residential accommodation. This would be contrary to the general aspiration to provide active frontages across Camden.</p>

It is conclusive that the available eligible units within the identified wards are not appropriate to accommodate off-site residential uses. As such, a payment in lieu is fully justified in the circumstances.

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